



Minnesota Pollution Control Agency

July 22, 1985

Ms. Laurie Potter
Potter & Associates
Star Route Box 199
Cook, Minnesota 55723

Dear Ms. Potter:

Re: Discharge Permit Denial
Irathane Resins

This Agency is in receipt of your letter, dated June 10, 1985 and addressed to Mr. Darryl Weakley of this Agency. In this letter you requested permission to discharge three different liquid resins to the Hibbing sewer system, based on a previous Agency approval. Your letter included the Material Safety Data Sheet (MSDS) for the three intended resins, namely "e-Caprolactone", "Quadrol" and "Pluracol 220".

Based on the MSDS that you supplied it should be clear to you that both "Quadrol" and "Pluracol 220" shall not be discharged into waterways or sewer systems.

In the case of "e-Caprolactone" the case is not as clear-cut since "Laboratory tests indicate that, at low concentrations in water, this product should be readily biodegradable in a biological wastewater treatment plant." Unfortunately, this statement is misleading in its generality: Laboratory tests may be considerably different than an operating facility and the conditions of the laboratory tests (temperature, detention time, waste kinds, treatment types) are not specified; what is meant by low concentration is not specified; "should be readily biodegradable" raises the question as to why the statement does not make the clear claim that this product is readily biodegradable! Based on this information it is deemed inappropriate that this product be discharged to any sewer system. e-Caprolactone is therefore not authorized to be disposed of by means of the Hibbing sewer system.

Phone: 612/297-3365

1935 West County Road B2, Roseville, Minnesota 55113-2725

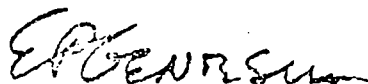
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Please note that the waste disposal method for all three products is indicated in the MSDS to be incineration: unfortunately the MSDS does not provide information on incineration temperature or other precautions during incineration. However, it would seem that since the three drums appear to be of the pure products, your first recourse should be to send the materials back to the manufacturers.

Should you have additional comments or questions you can reach me at (612) 297-3365.

Sincerely,

A handwritten signature in dark ink, appearing to read "EP GENTZSCH". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Enrique P. Gentzsch
Enforcement Section
Division of Water Quality

EPG:cc

cc: Mr. Mike Kempe, Superintendent, Wastewater Treatment
Plant, Hibbing, MN.
Manager, Irathane Systems, Inc., Hibbing, Mn.